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Aviation Services (CNMI), Ltd. dba Freedom Air

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and
QIANYAN S. FEJERAN,

Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.
dba FREEDOM AIR,

Defendant.

CIVIL ACTION NO. 05-0033

**DEFENDANT'S PRETRIAL
DISCLOSURES; CERTIFICATE OF
SERVICE**

**TRIAL DATE: SEPTEMBER 24, 2007
TIME: 9:30 A.M.**

I. Witnesses.

A. Richard Brown, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith Ball LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241, Telephone: 670.322.3455, Fax: 670.322.3368.

B. Felicidad (Doll) Boddy, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith Ball LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241, Telephone: 670.322.3455, Fax: 670.322.3368.

1 C. Francisco Muna, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith
2 Ball LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241,
3 Telephone: 670.322.3455, Fax: 670.322.3368.

4 D. Inas Suzuke, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith
5 Ball LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241,
6 Telephone: 670.322.3455, Fax: 670.322.3368.

7 E. Pio Jose Tuano, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith
8 Ball LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241,
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10 F. Antonio Tuano, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith
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13 G. Niki Jung, Aviation Services (CNMI), Ltd. dba Freedom Air, c/o Carlsmith Ball
14 LLP, Carlsmith Building, Capitol Hill, P.O. Box 5241, Saipan, MP 96950-5241,
15 Telephone: 670.322.3455, Fax: 670.322.3368.

16 H. Richard Gill, Ph.D., Applied Cognitive Sciences, 2104 W. Riverside, Spokane,
17 WA 99201, Telephone No.: (509) 624-3714

18 I. Peter Diamond, M.D., Honolulu Sports Medical Clinic, Inc., 932 Ward Avenue,
19 Suite 460, Honolulu, Hawaii 96814

20 J. Rebuttal Witnesses, as may be required.

21 K. Impeachment Witnesses, as may be required.

22 L. Any witness Plaintiff calls.

II. Witnesses Whose Testimony May be Presented via video conference or deposition.

A. Richard Gill, Ph.D., Applied Cognitive Sciences, 2104 W. Riverside, Spokane, WA 99201, Telephone No.: (509) 624-3714

B. Peter Diamond, M.D., Honolulu Sports Medical Clinic, Inc., 932 Ward Avenue, Suite 460, Honolulu, Hawaii 96814

III. Documents to be Presented as Exhibits.

A. 8/22/05 Incident Report written by Francisco Muna.

B. 1/18/05 Incident Reports written by Felicidad Boddy.

C. Notes regarding Moses Fejeran written by Inas Suzuke.

D. Transcription of Incident Reports.

E. Various photographs and video of aircraft and disembarkation of passengers.

This includes photographs and video taken by both expert witnesses, Mr. Perez for Plaintiff and Applied Cognitive Sciences for Defendant.

F. SD3-60 Aircraft Training - Pre-Flight Inspection

G. Freedom Air's Continuous Airworthiness Maintenance Program

H. Applied Cognitive Sciences' Expert Report

I. Dr. Diamond's Expert Report

J. Plaintiff's Medical Records

K. Plaintiffs Responses and supplemental responses to Defendant's Requests for Interrogatories.

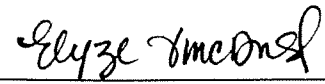
L. Documents for rebuttal and impeachment, as needed.

M. Frank Perez expert witness report, all exhibits to Mr. Perez's deposition transcript and exhibits to transcript of Rick Gill.

IV. Documents to be Presented as Exhibits if the Need Arises. At present, none.

1 DATED: August 27, 2007.

2 CARLSMITH BALL LLP

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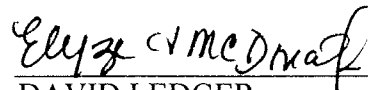
4 DAVID LEDGER
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of August 2007, I will cause to be served, via electronic filing/service, a true and correct copy of **DEFENDANT'S PRETRIAL DISCLOSURES; CERTIFICATE OF SERVICE** upon the following Counsel of record.

David G. Banes, Esq.
George L. Hasselback, Esq.
O'Connor Berman Dotts & Banes
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DATED: August 27, 2007.



DAVID LEDGER
ELYZE J. MCDONALD